

# Code of Conduct

Svizera Europe BV

Almere, The Netherlands

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Dear Business Partners

At Svizera Europe B.V. we believe that any company needs to act with integrity and to respect to all business partners, including customers, employees and suppliers.

With this in mind and feeling a great responsibility to carry this out, Svizera developed a third party code of conduct. This code of conduct outlines where Svizera Europe stands for and is also to be expected from all business partners.

The code of conduct is the minimum Svizera Europe requires from all business partners, including agents, distributors, consultants, freight forwarders and all other service providers. This code of conduct does not replace your own responsibility in good judgement and the use of common sense.

If any assistance is needed in making the right decisions encountering issues not covered by this code, contact the quality department of Svizera Europe.

Our business partners are expected to comply with the code and all applicable laws, rules and regulations. Neglecting or violating the law or this code of conduct, however small the violation, may lead to termination of the business relationship and notification of the appropriate authorities

When the code will be revised, you will be notified I time and responsible for implementation.

Svizera Europe B.V.  
Almere, The Netherlands 2022  
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QM manager

Managing director

QC/QP manager

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## General principles

The basis of this code is responsibility of all parties involved, with an open platform to communicate if the code raises questions, dilemmas or concerns about interpretations. In case of a possible violation, it is mandatory to inform Svizera Europe without any hesitation.

You are at least expected to:

- Implement and respect the Code and be familiarized with the content.
- Always follow the code and applicable laws
- Ethically and integrity should be the basis for each business decision.
- Avoid any action that could have the appearance of improper behavior.
- Never stay silent if the guidelines in this code have been violated or have the appearance of being violated
- Give your full commitment in any investigation.

If a situation occurs where a subject is not covered, or there are doubts about the implementation of the code, use the following questions:

- Is it legal?
- Is this right?
- Is it ethical?
- Is it doubtful?
- Is it consistent with the code?
- Am I convinced that this will not harm my good name, or the good reputation of Svizera Europe?
- Will I be able to look in the mirror with a good conscious tomorrow?

If the answer to any of these questions is “NO”, stop and do not do it.

## People

The work environment in Svizera Europe is based on the following principles:

- Diversity, equality and inclusion.
- Respect and trust.
- Zero tolerance regarding, (sexual) harassment, discrimination, unacceptable behavior.
- Safe, secure and healthy working environment.
- Possibility to grow for each individual
- Use of drugs and alcohol during work or being under the influence of same is prohibited.

All of the above is also requested from all business partners. Rude or inappropriate behavior against team members will not be accepted.

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## Human Rights

Svizera Europe under scribes human right for each individual as set out in the United Nations Universal Declaration of human rights and the core labor standards set out by the International labor organization.

What does Svizera Europe encourage:

- Education
- Freedom of association and collective bargaining.
- Employment or recruitment agreement in writing
- Freely chosen labor.

What will never be tolerated:

- Child labor
- Forced Labor
- People above 16 and under 18 working with hazardous goods, or working hours that interferes with the child education or harms the health or development.

## Business and financial records

- All records should be saved, in line with international guidelines and in accordance with applicable laws.
- All records need to be complete, accurate and correct.
- Descriptions of products and services need to be transparent and reflect the true nature of the transaction on each invoice.

## Conflict of interest

A conflict of interest or any action that has a potential of causing a conflict of interest should be avoided. In case a conflict of interest is applicable or might become applicable, contact the Quality department of Svizera Europe.

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## Anti-Bribery and corruption

Leading for Svizera Europe is the US foreign Corrupt Practices and the UK bribery act.

Although gifts and entertainment is a part of the social world. Taking that in consideration, the following is applicable:

- Gifts should be modest and never more than a value of 40 USD
- Meals and hospitality can never exceed the quality of an average restaurant in the country
- Money can never be paid to one of the employees

Bribery, corruption or facilitating of bribery and corruption will lead to an immediate end of the business relationship and will be reported to responsible authorities.

## Information, data safety and privacy

All data is stored in a safe well protected environment to avoid:

- Theft
- Accidental disclosure
- Improper/Unauthorized disclosure
- Misuse

Employees are trained to handle all data in line with the above. All applicable laws need to be followed and respected.

## Anti-trust and competition law

Svizera Europe competes within the framework of the applicable laws. Svizera Europe operates in a straight forward, fair and ethically justifiable manner and we expect all our business partners to do the same.

## Product Quality

- Product quality is secured in all quality systems and in line with applicable law and legislations.
- The quality is strictly monitored.
- Audits and risk analyses will take place on a regular basis.
- Products must meet the highest safety standards.
- Svizera Europe expects business partners also to adhere to its high quality standards.

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## Environment

Svizera Europe subscribes all principles of the Global Compact. Important points of attention

- Reduce energy
- Avoid pollution
- Reduce waist
- Be social responsible

Of course all applicable laws and regulations need to be respected, but on top of that Svizera will do the utmost to motivate all partners to invest in the future of the planet.

## Money Laundering

Money Laundering are money transactions with a goal to disguise of illegal activities. How can a company avoid to end up in Money Laundering?

- Never except cash payments
- Know your customers, initial and yearly reviews and approvals.
- Keep everything well documented
- Report suspicious transactions, to the quality department of Svizera Europe.

## Customs and trade

Applicable for Svizera Europe and all her partners:

- Respect of national and international laws, regulations and restriction
- Knowledge of applicable restrictions and regulations and monitoring changes
- Always share accurate and truthful information and documentation with customs authorities
- Obtain necessary import and export licenses in time.
- Do not supply or export goods that can be used for military purposes.
- Respect trade sanctions don t conduct business with entities that on the prohibited party list from the United Nations, European Union , US or Worldbank.

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## Reporting

In case of violation or suspected violation of this code of contact take immediate action, by contacting the Quality manager of Svizera Europe:

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